

## **Ecology's Draft Response to Comments for Ponderay Newsprint Company's (PNC) Public Comment Period**

**Thank you to all that submitted comments during this public comment period. We hope to provide a greater understanding of PNC's operations through this response to comments.**

### ***Comment No. 1 submitted by Elena Guilfoil on 2/6/2017***

#### **Comment #1:**

While looking at the draft permit to see what it said about opacity, I noticed the following on pg 3: 3.2.1.4. Except for system breakdowns and repairs, continuously record NOx emissions rate data per §60.49b(g); This is the only spot in the document where you use the § symbol instead of 40 CFR. I think it is clearer to the reader if you substitute "40 CFR" for the symbol. All other references to federal rules use the CFR citation.

#### **Ecology Response to Comment #1:**

Thank you for your comment. I will make the correction in the final order.

### ***Comment Nos. 2-9 submitted by Deane Osterman on 2/27/2017***

#### **Comment #2:**

The explanations of modeling used for determining potential impacts of PM emissions should be expanded and include isopleth charts of the modeling results for maximum values to allow a better understanding of potential deterioration in downwind air quality. An expanded explanation of the difference in the model approaches and results for the project-specific maximum values and expanded modeling for the full facility emissions would be helpful.

#### **Ecology Response to Comment #2:**

The initial modeling evaluation was for the log yard and debarker/chipper project alone and included the 1<sup>st</sup> highest result based upon 5 years of weather data. Because modelled values exceeded the Significant Impact Level (SIL), additional modeling was conducted to evaluate all sources of PM at the facility. Attachment A presents the plots that illustrate the cumulative modeling analysis of all PM<sub>10</sub> and PM<sub>2.5</sub> sources at facility.

#### **Comment #3:**

The proposed dust controls need to fully describe what is meant by the term enclosed. It is not clear that the debarker/chipper will be fully enclosed with no open sides of the building during operation. There should also be dust control for falling chips from the end of the conveyor incline to the top of the chip pile.

**Ecology Response to Comment #3:**

The proposed debarker/chipper is shown in the NOC application manufacturer's specifications. The equipment that debarks and chips the logs is enclosed, but the entire unit is not enclosed in a building. The chips dropping onto the pile will have a high moisture content of 34 percent which will result in minimal fugitive emissions from that operation. All site fugitive emissions will be managed pursuant to a fugitive dust control plan, with water or dust suppressant applied as necessary. No visible emissions are allowed beyond the facility property line.

**Comment #4:**

It is not evident that the calculations for potential to emit necessary to determine the facility PSD status includes all methanol sources as part of total VOC calculation (e.g., wastewater). This needs to be verified and PSD status clarified before proceeding with expansion.

**Ecology Response to Comment #4:**

Fugitive methanol emissions from the Waste Water Treatment Plant are included in the Statement of Basis for the latest Air Operating Permit evaluation which summarizes all emissions from the facility. However, fugitive emissions are not included in source evaluations for PSD applicability for TMP pulp and paper mills (WAC 173-400-820 (3)). The facility was evaluated for PSD applicability from all point sources at 235 tons per year VOC which is less than the PSD threshold of 250 tons per year. Ponderay Newsprint is not a PSD source.

**Comment #5:**

It is also not clear that the potential to emit calculation was based on simultaneous operations of the Nebraska Boiler and Fluidized Bed Boiler (FBB) as allowed under the current operating permit. If they will not be operating simultaneously, then that should be clearly specified.

**Ecology Response to Comment #5:**

It does appear that the Statement of Basis for the facility does not list the potential VOC emissions from the two boilers. The potential to emit (PTE) for the Nebraska Boiler is 1.5 tons per year VOC and the FBB is 0.5 tons per year VOC. These PTE values from the boilers were included in the 235 tons per year VOC PTE from facility point sources. There are not restrictions on the simultaneous operation of the Nebraska Boiler and the FBB.

**Comment #6:**

While there is a synthetic limit on paper production to remain below the PSD major threshold, there does not appear to be any restrictions on boiler operations to remain below the PSD major threshold.

**Ecology Response to Comment #6:**

The Nebraska boiler was evaluated based upon the operational limit of 6 million gallons of propane. The FBB was evaluated based upon year round operation (8760 hours per year) and maximum rated capacity of 64 MMBTU/hr. The FBB will operate primarily with biomass fuel

with 2 million gallons of propane for startup. Ecology has determined that additional limits are not necessary.

**Comment #7:**

The debarker/chipping expansion will create significantly more wood waste, and if it is burned unrestricted in the FBB, it will result in more boiler emissions. An explanation should be included as part of the evaluation of the proposed expansion for how increased wood waste fuels and FBB operations will be conditioned to remain a PSD synthetic minor.

**Ecology Response to Comment #7:**

As stated in responses to comments 5 and 6, the FBB PTE was evaluated at maximum rated capacity and year round operation. This previous analysis provided the highest potential VOCs from the FBB. Ecology has determined that additional limits are not necessary.

**Comment #8:**

It appears that compliance with the NO<sub>2</sub>-NAAQS has never been verified at the facility. If debarker/chipper wood waste is not restricted from being burned in the FBB, then compliance with the NO<sub>2</sub> standard needs also to be verified as part of the evaluation for the expanded emissions created by the project.

**Ecology Response to Comment #8:**

This comment is beyond the scope of the proposed permitting action. This action does not result in any increase in NO<sub>x</sub> emissions. However, compliance with the NO<sub>2</sub>-NAAQS was evaluated and verified for this facility during the 2000 permitting effort based upon the Nebraska boiler maximum potential emissions and the FBB at maximum rated capacity and year round operation.

**Comment #9:**

It is well established that SEPA requires consideration of a project's cumulative impacts. As it does not appear that Ecology has performed a comprehensive review of all facility operations at any point in time, an EIS is the most appropriate tool to fully evaluate cumulative impacts.

**Ecology Response to Comment #9:**

Ponderay Newsprint Company submitted a final EIS on July 31, 1985 for the initial installation of the mill and the Nebraska boiler. Another final EIS was submitted on October 25, 2000 for the installation of the FBB. Ecology has conducted a SEPA evaluation for this action and made a Determination of Non-Significance (DNS) based upon review of the installation of a log yard and electric debarker/chipper. A copy of the DNS and the SEPA checklist is provided at Attachment B.

## Comments in original format:

**From:** Guilfoil, Elena (ECY)  
**Sent:** Monday, February 06, 2017 8:31 AM  
**To:** Filipy, Jenny (ECY) <[JFIL461@ECY.WA.GOV](mailto:JFIL461@ECY.WA.GOV)>  
**Subject:** small comment on draft Ponderay Newsprint permit

Jenny

While looking at the draft permit to see what it said about opacity, I noticed the following on pg 3:

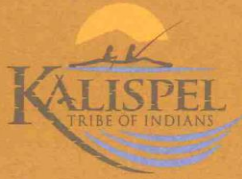
3.2.1.4. Except for system breakdowns and repairs, continuously record NOX emissions rate data per § 60.49b(g);

This is the only spot in the document where you use the § symbol instead of 40 CFR. I think it is clearer to the reader if you substitute “40 CFR” for the symbol. All other references to federal rules use the CFR citation.

Great timing. I got to see how a draft permit is laid out.

Thanks.

Elena



February 27, 2017

Karen Wood  
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Washington State Department of Ecology  
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Sent by email to: [kwoo461@ecy.wa.gov](mailto:kwoo461@ecy.wa.gov)  
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**RE: Ponderay Newsprint SEPA/Air Permit Comments**

Dear Ms. Wood:

The Kalispel Tribe has a compelling sovereign interest in protecting Reservation air quality for the health and well being of our people in the present, and far into the future. After reviewing the proposed debarker/chipper expansion of the Ponderay Newsprint Mill and previous additions of boilers to burn wood waste and sludge at the facility, we are concerned that downwind air quality has been allowed to deteriorate incrementally since the initial construction of the Mill. This incremental deterioration is attributable in part to Ecology's piecemealed review of past expansion projects. The Tribe urges Ecology to remedy this problem by addressing the comments below as part of an EIS that analyzes the effects of the immediate expansion in addition to ongoing operations at Ponderay Newsprint.

**The particulate matter (PM) emissions analysis of impacts from the proposed debarker/chipper project needs to be better explained and the proposed dust control better described.**

- The explanations of modeling used for determining potential impacts of PM emissions should be expanded and include isopleth charts of the modeling results for maximum values to allow a better understanding of potential deterioration in downwind air quality. An expanded explanation of the difference in the model approaches and results for the project-specific maximum values and expanded modeling for the full facility emissions would be helpful.
- The proposed dust controls need to fully describe what is meant by the term enclosed. It is not clear that the debarker/chipper will be fully enclosed with no open sides of the building during operation. There should also be dust control for falling chips from the end of the conveyor incline to the top of the chip pile.


**The total emission of VOCs from the mill is not adequately assessed or proposed to be mitigated as part of the project impact analysis resulting in more contribution of VOCs to the Mill's total emissions. The correct PSD threshold status of the entire facility needs to be confirmed before the additional expansion of VOC emissions is allowed.**

- It is not evident that the calculations for potential to emit necessary to determine the facility PSD status includes all methanol sources as part of total VOC calculation (e.g., wastewater). This needs to be verified and PSD status clarified before proceeding with expansion.
- It is also not clear that the potential to emit calculation was based on simultaneous operations of the Nebraska Boiler and Fluidized Bed Boiler (FBB) as allowed under the current operating permit. If they will not be operated simultaneously, then that should be clearly specified.
- While there is a synthetic limit on paper production to remain below the PSD major threshold, there does not appear to be any restrictions on boiler operations to remain below the PSD major threshold.
- The debarker/chipping expansion will create significantly more wood waste, and if it is burned unrestricted in the FBB, it will result in more boiler emissions. An explanation should be included as part of the evaluation of the proposed expansion for how increased wood waste fuels and FBB operations will be conditioned to remain a PSD synthetic minor.
- It appears that compliance with the NO<sub>2</sub>-NAAQS has never been verified at the facility. If debarker/chipper wood waste is not restricted from being burned in the FBB, then compliance with the NO<sub>2</sub> standard needs also to be verified as part of the evaluation for the expanded emissions created by the project.

It is well established that SEPA requires consideration of a project's cumulative impacts. As it does not appear that Ecology has performed a comprehensive review of all facility operations at any point in time, an EIS is the most appropriate tool to fully evaluate cumulative impacts.

Please feel free to contact Ken Merrill or my staff at 509-447-7276 if you have any questions.

Regards,

  
Deane Osterman, Executive Director  
Kalispel Natural Resources

Cc via email: Jenny Filipy, Ecology  
Terri Costello, Ecology  
Grant Pfeifer, Ecology